

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION  
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UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT FILLMORE,

**INDICTMENT**

Defendant.

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The Grand Jury charges:

**COUNT 1**  
**(Theft from Program Receiving Federal Funds)**

From on or about January 1, 2021, through on or about December 31, 2021, in the Western District of Michigan, Southern Division, the defendant,

**ROBERT FILLMORE,**

being an agent of Victim Organization 1, which was an organization receiving federal benefits in excess of \$10,000 in a one-year period under grants and federal assistance awarded by the U.S. Department of Health and Human Services, embezzled, stole, obtained by fraud, intentionally misapplied, and otherwise without authority knowingly converted to his own use, property and funds valued at \$5,000 or more, which property and funds were owned by and under the care, custody and control of Victim Organization 1.

**18 U.S.C. § 666(a)(1)(A)**

**COUNT 2**  
**(Theft from Program Receiving Federal Funds)**

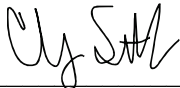
From on or about January 1, 2022, through on or about December 31, 2022, in the Western District of Michigan, Southern Division, the defendant,

**ROBERT FILLMORE,**

being an agent of Victim Organization 1, which was an organization receiving federal benefits in excess of \$10,000 in a one-year period under grants and federal assistance awarded by the U.S. Department of Health and Human Services, embezzled, stole, obtained by fraud, intentionally misapplied, and otherwise without authority knowingly converted to his own use, property and funds valued at \$5,000 or more, which property and funds were owned by and under the care, custody and control of Victim Organization 1.

**18 U.S.C. § 666(a)(1)(A)**

MARK A. TOTTEN  
United States Attorney



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CLAY STIFFLER  
Assistant United States Attorney

A TRUE BILL

[ /s/ Redacted ]  
GRAND JURY FOREPERSON